

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

SECURITIES AND EXCHANGE COMMISSION,	:	x
	:	
Plaintiff,	:	19 Civ. 09439 (PKC)
	:	
- against -	:	ECF Case
	:	
TELEGRAM GROUP INC. and TON ISSUER INC.	:	
	:	
Defendants.	:	
	:	

NOTICE OF MOTION

PLEASE TAKE NOTICE that Non-Party [REDACTED]

(previously identified as “Investor F”)¹, upon (1) the accompanying memorandum of law, and (2) the declaration of [REDACTED], dated February 18, 2020, will move this Court before the Honorable P. Kevin Castel, at the United States Courthouse, Courtroom 11D, 500 Pearl Street, New York, New York 10007, at such time as the Court may designate, for an order maintaining under seal a document the Securities and Exchange Commission (“SEC”) previously lodged with the Court as Exhibit B to the Letter of Jorge G. Tenreiro (ECF No. 181) in support of the SEC’s Application for a Preliminary Judgment (ECF No. 98), as specified in the memorandum of law accompanying the instant Notice of Motion.

¹ The SEC previously filed a motion requesting an Order to file under seal and in redacted form on ECF materials reflecting investor names. (ECF No. 28.) This document continues to redact this information, and related identifying information. We respectfully submit that these redactions should be maintained for the reasons stated in the SEC’s prior motion. Moreover, we were subsequently identified with the pseudonym “Investor F” in the Declaration of Ladan F. Stewart (ECF No. 81) (“Stewart Decl.”). This motion continues to use that pseudonym for the Court’s convenience and to avoid confusion.

Dated: February 18, 2020

Respectfully submitted,

/s/ Philip M. Bowman

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